

REMARKS

The present invention comprises a system for precisely controlling an amount of flatness or curvature of a lapping plate. Importantly, the system can adjust the temperature of the lapping plate during charging to selectively charge different areas of the lapping plate in a dictated order. For example, a middle diameter portion of the lapping plate may be charged first, and then an inner diameter portion of the lapping plate and/or an outer diameter portion of the lapping plate.

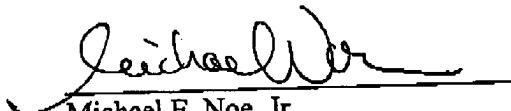
These distinctions are not found in the prior art. Indeed, the Examiner has not cited the primary reference, *Lee*, against the claims citing these elements (e.g., Claims 6 and 7) because it is incapable of satisfying these requirements. The Examiner has cited *Maeda* in view of *Lee* under § 103(a) to reject these claims. However, the Examiner conceded that *Maeda* "does not disclose means for controlling a temperature of the lapping plate." Office Action, page 4, paragraph 6. Thus, since neither *Lee* nor *Maeda* are capable of "adjusting the temperature of the lapping plate during charging to selectively charge different areas of the lapping plate in a dictated order," the present invention is not anticipated by nor obvious in light of those references.

Claim 1 was rewritten to take advantage of this distinction by incorporating the language of canceled claim 6. Claim 1 now states that "the temperature of the lapping plate is adjusted during a charge process to selectively charge different areas of the lapping plate in a dictated order," and is allowable over the prior art. Moreover, dependent Claim 7 still requires that "a middle diameter portion of the lapping plate is charged first, and then an inner diameter portion of the lapping plate and/or an outer diameter portion of the lapping plate." This specific example is not taught by or suggested by either one of the references. Claim 11 specifies one of the layers as "a tin-antimony alloy." Antimony alloys are not mentioned in either reference. Furthermore, Claim 12 limits the plate to having "a linear expansion coefficient of  $23-x \cdot 10^{-6}/^{\circ}\text{C}$  bonded to another material with a linear expansion coefficient of  $10-x \cdot 10^{-6}/^{\circ}\text{C}$ ." These very narrow limitations are not found or suggested anywhere in the references.

New dependent Claim 18 also defines the means for controlling temperature as "a temperature regulating unit that circulates fluid that travels between a thermal bath and a chuck holding the lapping plate." Claim 19 requires "an interior air temperature of a facing tool is also regulated during facing of the lapping plate." Support for these claims is found in paragraph [0026] of Applicant's specification. The elements of these claims are completely unique when compared to the prior art. In addition, new independent Claim 20 and its progeny were narrowly written to incorporate many of these distinguishing elements, including the elements of Claim 18, and are likewise allowable.

It is respectfully submitted that the claims are in condition for allowance and favorable action is requested. No fee for an extension of time or other fees are believed to be required. However, in the event that an extension of time is required, please charge that extension fee and any other required fees to **Hitachi Global Storage Technologies' Deposit Account Number 50-2587.**

Respectfully submitted,



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